

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: : Chapter 11
: :
MOTORS LIQUIDATION COMPANY, *et al.*, : Case No.: 09-50026 (MG)
f/k/a General Motors Corp., *et al.*, :
: :
Debtors. : (Jointly Administered)
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**STIPULATION AND ORDER REGARDING
DISCLOSURE OF COMMON INTEREST AGREEMENT**

This Stipulation and Order sets forth the agreement between: (i) the Ignition Switch Plaintiffs and certain Non-Ignition Switch Plaintiffs (the “Economic Loss Plaintiffs”); (ii) certain Pre-Closing Accident Plaintiffs (together with the Economic Loss Plaintiffs, the “Plaintiffs”); (iii) Wilmington Trust Company, in its capacity as trustee and administrator (the “GUC Trust”); (iv) the Participating Unitholders; and (v) General Motors LLC (collectively, the “Parties” and each individually, a “Party”).

WHEREAS, the Court held a telephonic conference on November 7, 2017 to address a dispute between the GUC Trust and Participating Unitholders regarding the GUC Trust’s proposed disclosure of documents covered by a common interest agreement between the GUC Trust and the Participating Unitholders entered into in 2014 (the “CIA”); and

WHEREAS, the Court suggested to the GUC Trust and the Participating Unitholders to produce the CIA subject to a stipulation to be agreed upon by the Parties that disclosure of the CIA would not result in a waiver of any communications protected by the CIA;

IT IS NOW HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the Parties as follows:

1. The GUC Trust and/or Participating Unitholders will promptly produce the CIA to the Parties upon the filing of this Stipulation.

2. The Parties agree that the production of the CIA to them does not waive any applicable privilege or protection with respect to the underlying documents and materials covered by the CIA.

3. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and/or enforcement of this Stipulation and Order.

Dated: New York, New York
November 9, 2017

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Counsel to General Motors LLC

IT IS SO ORDERED.

Dated: November 9, 2017
New York, New York

/s/ Martin Glenn
MARTIN GLENN
United States Bankruptcy Judge